UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

TECUMSEH PRODUCTS COMPANY

Plaintiff,

Case No. 2:17-cv-10249-PDB-RSW

v.

Paul D. Borman
United States District Judge

KULTHORN KIRBY PUBLIC COMPANY, LTD. and ELCO SOLUTIONS, LLC.

R. Steven Whalen
United States Magistrate Judge

Defendants.
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TECUMSEH'S RESPONSE
TO COURT'S ORDER REQUIRING DISCLOSURE

Plaintiff Tecumseh Products Company, LLC ("Tecumseh"), by counsel, respectfully submits the following response to the Court's Order of April 5, 2017, wherein the Court ordered disclosure of the identity of Tecumseh's members, and states as follows:

1.) Tecumseh responds to the Court's Order as follows:

Tecumseh Products Company is an LLC whose sole member is Tecumseh Products Holdings LLC.

Tecumseh Products Holdings LLC has two members - (1) DENO Investment Company II, Inc. and (2) AMT Holdings LLC.

AMT Holdings LLC has three members - (1) Sound Harbor Capital Solutions Fund II LP, (2) Atlas Capital Resources II (A4) LP, and (3) Atlas Capital Resources (P) II LP.

2.) Tecumseh respectfully submits that it is uncertain how much further the Court is ordering disclosure of for its ownership chain - there are additional layers, most of which are comprised of additional LLCs or partnerships.

3.) Because Tecumseh has invoked only the Court's federal question jurisdiction, not the Court's diversity jurisdiction, Tecumseh believes that the above disclosure is sufficient to meet the Court's request and the needs that are assumed by the undersigned to be at the origin of that request (e.g., for evaluation of any potential conflicts of interest).

4.) However, if the Court requires further disclosure, then Tecumseh respectfully advises that such additional information is commercially sensitive and private information, as Tecumseh is a privately owned company. Accordingly, if the Court requires further disclosure, then Tecumseh respectfully requests an opportunity to submit such additional disclosure to the Court for an *in camera, ex parte* review by the Court in order to maintain the confidentiality of such information, and for all other appropriate relief.

Respectfully submitted,

By: /s/ Deborah J. Swedlow_
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COUNSEL FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2017, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification to all counsel of record.

By: /s/ Deborah J. Swedlow